## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

ABDULRAHMAN ALHARBI,	)
Plaintiff,	)
v.	) Civil Action ) No. 14-11550-PBS
GLENN BECK; THE BLAZE, INC.; MERCURY RADIO ARTS, INC.; and	)
PREMIERE RADIO NETWORKS, INC.,	)
Defendants.	) )

## PLAINTIFF'S RESPONSE TO COURT'S ORDER OF AUGUST 25, 2016

The plaintiff, Abdulrahman Alharbi ("Plaintiff"), responds to the Court's Order of
August 25, 2016 [Docket No. 139] by incorporating by reference <u>Plaintiff's Motion for</u>

<u>Sanctions and Entry of Default Judgment for Willful Failure to Comply with Order Compelling</u>

Disclosure of Identity of Fact Witnesses [Docket No. 141] as if fully set forth herein.

Wherefore, the Plaintiff prays that the Court:

- a. enter a default judgment in favor of the Plaintiff against all Defendants in this action;
- b. determine the damages incurred by the Plaintiff and enter judgment against all
   Defendants in that amount, plus interest and costs;
- c. award the Plaintiff the value of fees and costs incurred in prosecuting the motion to compel; and
- d. grant such other and further relief as is just.

## ABDULRAHMAN ALHARBI

By his attorneys,

/s/ Peter J. Haley

Peter J. Haley (BBO # 543858)
peter.haley@nelsonmullins.com
Gregory J. May (BBO #642646)
greg.may@nelsonmullins.com
NELSON MULLINS RILEY & SCARBOROUGH LLP
One Post Office Square – 30th Floor
Boston, Massachusetts 02109-2127
Telephone: (617) 573-4700

Dated: September 7, 2016

## **CERTIFICATE OF SERVICE**

I, Peter J. Haley, hereby certify that on this 7th day of September, 2016 this pleading was served upon counsel to the Defendants in this action.

/s/Peter J. Haley
Peter J. Haley